

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

V.

CIVIL ACTION NO.:

1:22-cv-04149-WMR

FELICIA FRANKLIN, in her individual  
and official capacities; ALIEKA

ANDERSON, in her individual and official capacities; GAIL HAMBRICK, in her individual and official capacities; and CLAYTON COUNTY, GEORGIA,

Defendants.

# CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.4, I hereby certify that on November 21, 2024, I electronically filed **DEFENDANT ALIEKA ANDERSON'S RESPONSE TO PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Edward D. Buckley  
Paul Jay Pontrelli  
BUCKLEY BALA WILSON MEW  
LLP  
600 Peachtree Street NE  
Ste. 3900

Melissa A. Tracy  
Ken E. Jarrard  
JARRARD & DAVIS, LLP  
222 Webb Street  
Cumming, GA 30040  
[mtracy@jarrard-davis.com](mailto:mtracy@jarrard-davis.com)

Atlanta, GA 30308  
[edbuckley@bbwmlaw.com](mailto:edbuckley@bbwmlaw.com)  
[jpontrelli@bbwmlaw.com](mailto:jpontrelli@bbwmlaw.com)

[kjarrard@jarrard-davis.com](mailto:kjarrard@jarrard-davis.com)

Kirsten S. Daughdril  
A. Ali Sabzevari  
Jack R. Hancock  
John D. Bennett  
FREEMAN MATHIS & GARY, LLP  
100 Galleria Parkway, Ste. 1600  
Atlanta, GA 30339  
[kirsten.daughdril@fmglaw.com](mailto:kirsten.daughdril@fmglaw.com)  
[asabzevari@fmglaw.com](mailto:asabzevari@fmglaw.com)  
[jhancock@fmglaw.com](mailto:jhancock@fmglaw.com)  
[jbennett@fmglaw.com](mailto:jbennett@fmglaw.com)

Respectfully submitted this 21<sup>st</sup> day of November, 2024.

**GDCR, LLC**

/s/ Randall C. Farmer  
Randall C. Farmer  
Georgia Bar Number 255345  
Attorneys for Defendant Anderson

49 Atlanta Street  
Marietta, Georgia 30060  
Telephone: 770-422-1776  
Facsimile: 770-426-6155  
[rfarmer@gdcrlaw.com](mailto:rfarmer@gdcrlaw.com)

**CERTIFICATION OF COUNSEL**

The undersigned pursuant to this Court's Local Rules hereby certifies that this document has been prepared with Times New Roman 14 point.

This 21<sup>st</sup> day of November, 2024.

**GDCR, LLC**

*/s/ Randall C. Farmer*\_\_\_\_\_

Randall C. Farmer

Georgia Bar Number 255345

Attorneys for Defendant Anderson

49 Atlanta Street  
Marietta, Georgia 30060  
Telephone: 770-422-1776  
Facsimile: 770-426-6155  
[rfarmer@gdcrlaw.com](mailto:rfarmer@gdcrlaw.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

V.

FELICIA FRANKLIN, in her individual and official capacities; ALIEKA ANDERSON, in her individual and official capacities; GAIL HAMBRICK, in her individual and official capacities; and CLAYTON COUNTY, GEORGIA,

Defendants.

CIVIL ACTION NO.:  
1:22-cv-04149-WMR

## CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2024, I electronically filed the **5.4**

**CERTIFICATE OF SERVICE FOR DEFENDANT ALIEKA ANDERSON’S**

**RESPONSES TO PLAINTIFF REQUEST FOR THE PRODUCTION OF**

**DOCUMENTS** with the Clerk of Court using the CM/ECF system which will

automatically send email notification of such filing to the following attorneys of

record:

Edward D. Buckley  
Paul Jay Pontrelli  
BUCKLEY BALA WILSON MEW  
LLP  
600 Peachtree Street NE  
Ste. 3900

Melissa A. Tracy  
Ken E. Jarrard  
JARRARD & DAVIS, LLP  
222 Webb Street  
Cumming, GA 30040  
[mtracy@jarrard-davis.com](mailto:mtracy@jarrard-davis.com)

Atlanta, GA 30308  
[edbuckley@bbwmlaw.com](mailto:edbuckley@bbwmlaw.com)  
[jpontrelli@bbwmlaw.com](mailto:jpontrelli@bbwmlaw.com)

[kjarrard@jarrard-davis.com](mailto:kjarrard@jarrard-davis.com)

Kirsten S. Daughdril  
A. Ali Sabzevari  
Jack R. Hancock  
John D. Bennett  
FREEMAN MATHIS & GARY, LLP  
100 Galleria Parkway, Ste. 1600  
Atlanta, GA 30339  
[kirsten.daughdril@fmglaw.com](mailto:kirsten.daughdril@fmglaw.com)  
[asabzevari@fmglaw.com](mailto:asabzevari@fmglaw.com)  
[jhancock@fmglaw.com](mailto:jhancock@fmglaw.com)  
[jbennett@fmglaw.com](mailto:jbennett@fmglaw.com)

**GDCR, LLC**  
Attorneys for Defendant Anderson

/s/ Randall C. Farmer  
Randall C. Farmer  
Georgia Bar Number 255345

49 Atlanta Street  
Marietta, Georgia 30060  
Telephone: 770-422-1776  
Facsimile: 770-426-6155  
[rfarmer@gdcrlaw.com](mailto:rfarmer@gdcrlaw.com)

Doc. 4000026